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January 7, 2025

**VIA ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

**Re: *United States v. Alexander et al.*, Docket No. 24-CR-00676 (VEC)**

Dear Judge Caproni:

On behalf of defendants Tal Alexander and Alon Alexander, we submit this letter respectfully requesting that the Court extend the defendants' respective stays of removal to the Southern District of New York through the date of the hearing on their appeals of their detention orders. We make this request so that undersigned counsel can continue to communicate with the defendants to prepare for this upcoming hearing. We understand that if the defendants are removed, it may be difficult to communicate with them while they are in transit, and that the period of transit may comprise a substantial portion of the next week or longer. As we have previously stated, we intend to waive their appearances at the hearing. The government takes no position on this motion.

Tal Alexander previously requested that this Court stay removal from the Southern District of Florida on December 24, 2024 (ECF No. 9), which the Court granted through the earlier of January 6, 2025 or when removal was ordered for either of the codefendants in this matter (ECF No. 13). With respect to Alon Alexander, the Honorable Magistrate Judge Eduardo I. Sanchez in the Southern District of Florida granted Alon Alexander's request to stay removal through January 7, 2025. *See* 24-MJ-04616 (EIS), ECF No. 23 (S.D. Fla.).

Thank you for your consideration.

Respectfully submitted,

*/s/ Milton L. Williams*

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cc: All counsel via ECF

Application DENIED. In the Court's prior Order at Dkt. 13 temporarily staying Defendant Tal Alexander's removal, the Undersigned expressed skepticism regarding the difficulties he claimed he would encounter if he were in transit to New York while his counsel prepared the appeal of the Detention Order issued in *United States v. Alexander*, 1:24-mj-4544 (S.D. Fla. Dec. 11, 2024), at Dkt. 24. Nearly a month has passed since the indictment in this matter was unsealed. Defendants Tal and Alon Alexander have had several weeks to prepare bail applications with their respective counsel and would not be unduly prejudiced by removal occurring before the consolidated bail hearing scheduled for January 15, 2025.

SO ORDERED.



1/7/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE